

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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MARLEEN M. LAPLANT, on her own behalf  
and on behalf of a class similarly situated,

Plaintiffs,

v.

Case No. 2:11-CV-00910

THE NORTHWESTERN MUTUAL  
LIFE INSURANCE COMPANY,

Defendant.

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**CLASS COUNSEL'S SUPPLEMENTAL DECLARATION IN SUPPORT OF  
FINAL APPROVAL OF SETTLEMENT**

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I, George P. Kersten, declare as follows:

1. I am a co-lead counsel for the Settlement Class certified on March 26, 2015. I made the declaration dated July 6, 2015 in support of Plaintiffs' motion for final approval of the proposed settlement and related relief. I make this supplemental declaration to provide further information supporting final approval and entry of the joint proposed order for final approval filed herewith.

2. Accompanying this declaration is the Proposed Order Granting Final Approval of Settlement and related relief which all parties have agreed to jointly submit to the Court pursuant to the Settlement Agreement.

3. Also accompanying this declaration is the Supplemental Affidavit of Rebecca A. Blake, Program Manager of Rust Consulting, Inc. ("Rust"), describing the

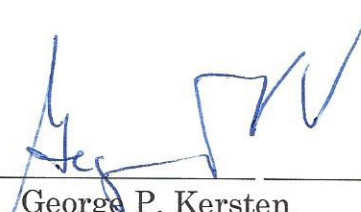
notices provided to the Settlement Class, past and anticipated settlement administration services and costs and the response of Class Members to the notices.

4. As stated in the Blake Supplemental Affidavit, ¶ 8, 7 Class Member opt-out requests were discovered while Rust was validating claim forms, in addition to the 7 opt-outs reported in my July 6, 2015 declaration. Thus, there are 14 persons who have timely excluded themselves from the Settlement Class. They are identified in the sealed envelope being filed with the Blake Supplemental Affidavit. As that affidavit further confirms, no Class Member has objected to the Settlement Agreement or any part thereof. *Id.*, ¶ 9.

5. Class Counsel have expended \$1,951.86 in addition to the litigation expenses of \$822,746.12 earlier reported to the Court. Thus, Class Counsel's total litigation expenses to date are \$824,697.98.

I declare under penalty of perjury pursuant to the laws of the State of Wisconsin that the foregoing statements of fact are true and correct.

Executed this 25th day of September, 2016 in Milwaukee, Wisconsin.



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George P. Kersten